Case 3:15-cv-05676-JST Document 90 Filed 05/09/16 Page 1 of 3 Charles T. Marshall, Esquire (SBN 176091) 1 Law Offices of Charles T. Marshall 415 Laurel Street, # 405 2 San Diego, California 92101 619-807-2628 Tel: 3 Fax: 866-575-7413 4 Email: cmarshall@marshallestatelaw.com 5 Attorneys for Plaintiff JOHN F. LUNDY 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 THE NORTHERN DISTRICT OF CALIFORNIA 10 Case No. 3:15-cv-05676-EDL JST JOHN F. LUNDY 11 STIPULATION FOR EXTENSION OF Plaintiff, 12 TIME FOR PLAINTIFF TO FILE FIRST v. AMENDED COMPLAINT 13 SELENE FINANCE, LP; MTC FINANCIAL 14 d/b/a TRUSTEE CORPS; JPMORGAN CHASE) BANK, N.A.; BANK OF AMERICA, N.A.; 15 WILMINGTON SAVINGS FUND SOCIETY, FSB d/b/a CHRISTIANA TRUST, as trustee for 16 BCAT 2014-12TT and DOES 1-100 inclusive, 17 Defendant(s). 18 19 20 21 22 23 24 25 26 27

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1	WHEREAS, on April 28, 2016, this Court granted Plaintiff leave to amend complaint;
2	WHEREAS, First Amended Complaint is due May 10, 2016.;
3	WHEREAS, Plaintiff and Defendants Chase and Bank of America are in the process of
4	finalizing and executing respective settlement agreements, disposing of this case only as to same
5	litigants, the parties stipulate to extending the time for Plaintiff to file his First Amended
6	Complaint for 30 days;
7	NOW THEREFORE, Plaintiff and Defendants HEREBY STIPULATE AND AGREE AS
8	FOLLOWS:
9	1. Plaintiff's time to file his First Amended Complaint is extended for 30 days to June
10	9, 2016, pending finalization of settlement.
11	
12	IT IS SO STIPULATED.
13	DATED: May 6, 2016 DAVIS WRIGHT TREMAINE LLP
14	Jake Freed
15	By: <u>/s/ Jake Freed</u> Jake Freed
16	Attorneys for Defendant
17	JPMORGAN CHASE BANK, N.A.
18	Reed Smith LLP Tyler Austin Carle
19	By:/s/ Tyler Austin Carle
20	Tyler Austin Carle Attorneys for Defendant
21	Bank of America, N.A.
22	LAW OFFICES OF CHARLES T. MARSHALL Charles T. Marshall
23	By: /s/ Charles T. Marshall
24	Charles T. Marshall
25	Attorneys for Plaintiff JOHN F. LUNDY
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CERTIFICATION OF CONCURRENCE

Pursuant to L.R. 5-1, I hereby attest that John D. Freed, Esq, counsel for Defendant JPMORGAN CHASE BANK, N.A, and Tyler Austin Carle Esq, counsel for Defendant Bank of America, N.A. have provided his concurrence in the electronic filing of the foregoing document entitled STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE FIRST AMENDED COMPLAINT.

/s/ Charles T. Marshall

Charles T. Marshall

ORDER

It is so ordered.

Date: May 9, 2016

Jus. Figur